

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Civil Action No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**SECOND JOINT STIPULATION REGARDING
CLASS CERTIFICATION BRIEFING DEADLINES**

Lead Plaintiffs Plymouth County Retirement Association (“Plymouth County”) and the Trustees of the Teamsters Union No. 142 Pension Fund (“Teamsters 142”) (collectively, “Lead Plaintiffs”) and Defendants Apache Corporation (“Apache”), John J. Christmann, IV, Timothy J. Sullivan, and Stephen J. Riney (collectively, “Defendants” and, together with Lead Plaintiffs, the “Parties”) stipulate and agree as follows:

1. WHEREAS, on September 15, 2021, Judge Hanks referred all non-dispositive and dispositive pretrial matters in this case to Magistrate Judge Edison (Dkt. 42).
2. WHEREAS, on December 19, 2022, the Court, Judge Edison presiding, issued a Docket Control Order (“DCO,” Dkt. 86) setting the Parties’ pre-trial briefing schedule.
3. WHEREAS, pursuant to the DCO, Lead Plaintiffs filed their Motion for Class Certification on April 7, 2023.
4. WHEREAS, pursuant to the DCO and the May 10, 2023 Joint Stipulation and Order Regarding Class Certification Briefing Deadlines (Dkt. 112), the deadline for Defendants’ Opposition to Class Certification is currently June 9, 2023, the deadline for Lead Plaintiffs’ Reply in Support of Class Certification is currently July 28, 2023, and the deadline for Defendant’s Sur-

Reply in Opposition to Class Certification is currently August 25, 2023.

5. WHEREAS, Defendants have requested, and Lead Plaintiffs have agreed, to further extend the deadline for Defendants' Opposition to Class Certification by an additional seven days, to June 16, 2023.

6. WHEREAS, the Parties also wish to extend the subsequent class certification briefing deadlines by the same seven-day period.

7. WHEREAS, granting the relief requested herein will not affect any deadlines in the DCO other than those pertaining to Class Certification briefing.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their undersigned counsel, as follows:

8. Defendants will file their Opposition to Class Certification by June 16, 2023.

9. Lead Plaintiffs will file their Reply in Support of Class Certification by August 4, 2023.

10. Defendants will file their Sur-Reply in Opposition to Class Certification by September 1, 2023.

IT IS SO STIPULATED.

Dated: June 8, 2023

Respectfully submitted,

BAKER BOTTS L.L.P.

/s/ David D. Sterling

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Co-Lead Counsel for Lead Plaintiffs

IT IS SO ORDERED.

Dated: _____, 2023

Hon. Andrew M. Edison
United States Magistrate Judge